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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF ITS  
REPLY IN SUPPORT OF ITS MOTION  
FOR ORDER TO SHOW CAUSE WHY  
DEFENDANTS SHOULD NOT BE HELD  
IN CONTEMPT OF THE PRELIMINARY  
INJUNCTION ORDER (Dkt. 426) AND  
EXPEDITED DISCOVERY ORDER (Dkt.  
61)**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Reply in Support of its Motion for  
7 Order to Show Cause Why Defendants Should Not Be Held In Contempt of the Preliminary Injunction  
8 Order (Dkt. 426) and Expedited Discovery Order (Dkt. 61), filed concurrently herewith (the  
9 “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Reply	Highlighted Portions	Defendants (blue highlighting)

13 3. The highlighted portions of Waymo’s Reply contain references to information that  
14 Defendants have designated as confidential and/or highly confidential.

15 4. Waymo expects Defendants to file one or more declarations in accordance with the  
16 Local Rules.

17 I declare under penalty of perjury under the laws of the State of California and the United  
18 States of America that the foregoing is true and correct, and that this declaration was executed in Los  
19 Angeles, California, on July 12, 2017.

21 By /s/ Lindsay Cooper  
22 Lindsay Cooper  
23 Attorney for WAYMO LLC  
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**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven  
Charles K. Verhoeven